

EXHIBIT 1

Allegra Noonan

From: Allegra Noonan
Sent: Wednesday, October 4, 2023 11:50 AM
To: Longley, Serena; Theresa Trzaskoma; Amer, Andrew
Cc: Rita Glavin; Neesha Chhina
Subject: RE: Meet and Confer

Serena,

Please see below for our narrowed request for documents. Please let us know what time on Thursday afternoon works for you to meet and confer.

1. Unredacted transcripts and interview memos for (a) Trooper 1, and (b) any current or former NYSP member, including but not limited to those individuals Trooper 1 identifies in her initial disclosures, supplemental disclosures, and interrogatory responses:
 - Trooper 1
 - Jonathan Blazek
 - James Boyle
 - David Dively
 - Tim Dymond
 - Jennifer Gottstine
 - DJ Grant
 - Douglas Larkin
 - Christopher Long
 - Lacey Malbeuf
 - Brendan McIntyre
 - Joseph Metcalfe
 - Mary Moran
 - Tony Mordecki
 - Steve Nevins
 - Diane Parrotta
 - Fabricio Plaskocinski
 - Tommy Richardson
 - Philip Russo
 - Maria Salazar
 - Philip Salinardi
 - Kyle Shillingford
 - Robert Stallone
 - Vincent Straface
 - Todd Williams
2. Unredacted transcripts and interview memos for all other complainants in Trooper 1's Amended Complaint.
3. To the extent not already identified above, interview memos for the following anonymous NYSP members referenced in connection with Trooper 1's allegations in the OAG Report:
 - Senior Investigator #1
 - The "trooper" referenced in footnote 249
 - "Another Trooper" referenced in footnote 254
 - The "Trooper in the tail car" referenced on page 36

- The "PSU Troopers" referenced in footnote 262
- The "close friend" of Trooper 1 referenced on page 37
- The "Trooper friend" referenced in footnote 276
- The "Trooper" referenced on page 38
- The "Trooper sitting at the desk" and "the Trooper who Trooper #1 thought was sitting on the desk" referenced in footnote 287
- The "two other witnesses" referenced in footnote 287
- The "member of the PSU" referenced on page 39 and in footnote 294
- The "friend and colleague on the PSU" referenced on page 39
- Senior Investigator #2
- The "one PSU member" referenced in footnote 303
- "The "PSU Trooper who is a woman" referenced on page 40

4. All documents produced to the OAG by any NYSP witness.

Best,
Allegra



Allegra Noonan (she/her)

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From: Longley, Serena <Serena.Longley@ag.ny.gov>

Sent: Wednesday, October 4, 2023 8:49 AM

To: Theresa Trzaskoma <TTrzaskoma@shertremonte.com>; Amer, Andrew <Andrew.Amer@ag.ny.gov>

Cc: Rita Glavin <rglavin@glavinpllc.com>; Allegra Noonan <anoonan@shertremonte.com>; Neesha Chhina <NChhina@shertremonte.com>

Subject: Re: Meet and Confer

Good morning counsel - just following up here since we have not received any narrowed requests from you yet.

Thanks,
Serena

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From: Longley, Serena

Sent: Friday, September 29, 2023 2:19:09 PM

To: Theresa Trzaskoma <TTrzaskoma@shertremonte.com>; Amer, Andrew <Andrew.Amer@ag.ny.gov>